

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

THELMA JONES, PRIYIA LACEY, FAISA
ABDI, ALI ALI, RUKIYA HUSSEIN, LUCIA
PORRAS, DAVID TROTTER-FORD, AND
SOMALI COMMUNITY RESETTLEMENT
SERVICES, INC.,

Case: 18-cv-1643 (JRT/HB)

Plaintiffs,

v.

CITY OF FARIBAULT,

Defendant.

**DEFENDANT'S RESPONSE TO PLAINTIFFS' MOTION
TO DE-DESIGNATE RESTRICTED ORDER**

To the extent Plaintiffs' motion seeks only to remove the designation of the Restricted Order as confidential and attorney's eyes only under the protective order in this case, Defendant has no objection. The undersigned acted in good faith and sought to get the Restricted Order in Plaintiffs' counsels' hands as soon as practical and consistent with the language of the Restricted Order and the e-mail from Chief Judge Gelpi. The undersigned, however, will not stipulate to the removal of this designation, particularly since Plaintiffs now appear to claim we violated the Restricted Order by getting this in their hands too soon.

To the extent Plaintiffs' motion is broader – it is not clear how broad their motion actually is, by the way – and seeks to remove the “restricted” nature of the order, Defendant respectfully views that as a determination within the purview of Chief Judge Gelpi. We are certainly not privy to the details of the pending police reform case in Puerto Rico, but Chief Judge Gelpi obviously views the ACLU's ongoing litigation tactics as a clear and present danger to that significant and important effort. A respected jurist must have had good reasons to issue such an order.

Respectfully submitted,

IVERSON REUVERS CONDON

Dated: September 16, 2019

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